

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DANIEL PLAUT, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

THE GOLDMAN SACHS GROUP,  
INC., LLOYD C. BLANKFEIN,  
HARVEY M. SCHWARTZ, and R.  
MARTIN CHAVEZ,

Defendants.

Civ. A. No. 1:18-cv-12084-VSB

**CLASS ACTION**

**NOTICE OF MOTION AND MOTION OF IWA FOREST INDUSTRY PENSION PLAN  
FOR APPOINTMENT AS LEAD PLAINTIFF AND  
APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Vernon S. Broderick, at the United States District Court for the Southern District of New York, located at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 518, New York, New York 10007, IWA Forest Industry Pension Plan (“IWA Forest”), by counsel, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), will respectfully move this Court for an Order: (i) appointing IWA Forest as Lead Plaintiff in the above-captioned action (the “Action”), (ii) approving IWA Forest’s selection of Kaplan Fox & Kilsheimer LLP to serve as Lead Counsel for the class, and (iii) for any such further relief as the Court may deem just and proper. In support of this Motion, IWA Forest submits its Memorandum of Law in Support of the Motion of IWA Forest Industry Pension Plan for Appointment as Lead Plaintiff and Approval of Its Selection of Lead Counsel, and the Declaration of Frederic S. Fox in Support Thereof.

This Motion is made on the grounds that IWA Forest believes it is the “most adequate plaintiff” pursuant to the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, IWA Forest believes that it has the “largest financial interest” in the relief sought by the class in the Action as a result of the substantial loss it suffered on its purchases of The Goldman Sachs Group, Inc. securities during the Class Period. IWA Forest also believes that it otherwise satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure because its claims are typical of those of other class members and because it will fairly and adequately represent the interests of the class.

WHEREFORE, IWA Forest respectfully requests that the Court: (1) appoint IWA Forest as Lead Plaintiff in the Action in accordance with the PSLRA; (2) approve IWA Forest’s selection of Kaplan Fox to serve as Lead Counsel for the Class; and (3) grant any such further relief that the Court may deem just and proper.

Dated: February 19, 2019

Respectfully submitted,

/s/ Frederic S. Fox

Frederic S. Fox

Donald R. Hall

Jeffrey P. Campisi

Pamela A. Mayer

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*Attorneys for Movant IWA Forest Industry  
Pension Plan*

**CERTIFICATE OF SERVICE**

I, Frederic S. Fox, hereby certify that, on February 19, 2019, I caused the foregoing to be served on all counsel of record by filing the same with the Court using the CM\ECF system which will send electronic notices of the filing to all counsel of record.

/s/ Frederic S. Fox

Frederic S. Fox